

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

A.J. & Q.C.,

Plaintiffs,

v.

MASP, LLC,

Defendant.

CIVIL ACTION FILE

NO. 1:23-cv-4247-JPB

**PLAINTIFFS' NOTICE OF VIDEO DEPOSITION OF  
KIM MEHLMAN-OROZCO, PH.D.**

**TO: Kim Mehlman-Orozco, Ph.D.**  
c/o MASP, LLC Counsel

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 26 and 30, counsel for Plaintiffs will take the deposition of Kim Mehlman-Orozco, Ph.D. The deposition will be taken for all purposes permitted by the Federal Rules of Civil Procedure. The deposition will begin at **1:00 p.m. (EDT) on October 21, 2024, at 15001 Washington Street, Haymarket, Virginia 20169**. The deposition will be taken by oral examination before an officer duly authorized to administer oaths. The deposition will be recorded by stenographic and videographic means.

The deponent shall produce no later than **5:00 p.m. on October 18, 2024**, the documents and materials listed in Exhibit A. If meeting that production deadline will be an issue, Plaintiffs ask MASP, LLC to notify them immediately.

Respectfully submitted this 15th day of October, 2024.

ANDERSEN, TATE & CARR, P.C.

*/s/ Jennifer M. Webster*

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## CERTIFICATE OF COMPLIANCE

Under Local Rules 5.1(C) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font type and size requirements and is formatted in Times New Roman, 14-point font.

ANDERSEN, TATE & CARR, P.C.

*/s/ Jennifer M. Webster*

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## EXHIBIT A

Kim Mehlman-Orozco is requested to electronically produce the following by no later than **5:00 p.m. on October 18, 2024**, and to bring copies of the following to her deposition on **October 21, 2024**.

1. Kim Mehlman-Orozco's complete expert file for this matter. Omit nothing.
2. All documents or other materials that Kim Mehlman-Orozco relied on as a basis for the opinions in her written report.
3. All documents, deposition testimony, reports, or other materials that Kim Mehlman-Orozco reviewed during her work on this case that have not otherwise been produced.
1. All documents Kim Mehlman-Orozco reviewed to prepare for this deposition.
4. All communications between Kim Mehlman-Orozco and Defendant MASP, LLC, including those exchanged with defense counsel, relating to (a) compensation for her expert work, (b) facts or data that she considered when forming her opinions, and (c) assumptions that she relied on when forming her opinions.
5. All agreements or contracts Kim Mehlman-Orozco has with Defendant MASP, LLC or its counsel.
6. All invoices for Kim Mehlman-Orozco's work so far.

7. A list of all cases in which, during the previous 10 years, Kim Mehlman-Orozco has testified as an expert at trial or by deposition.
8. A list of all cases in which Kim Mehlman-Orozco was retained by or worked with the law firm of Swift, Currie, McGhee & Hiers, LLP or any lawyer working with or associated with this firm.
9. A list of all cases in which the testimony of Kim Mehlman-Orozco has been excluded or limited in any way, including by agreement of counsel.
10. All court orders excluding or limiting the testimony of Kim Mehlman-Orozco in any way, including orders entered based on agreement of counsel.
11. All demonstratives Kim Mehlman-Orozco plans to use in this case.